San Francisco Bay Conservation and Development Commission
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June 1, 2018

TO: Design Review Board Members

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SUBJECT: **New Fire Boat Station 35 at Piers 22.5 and 24; Second Pre-application Review, Joint Review with Port of San Francisco Waterfront Design Advisory Committee**
(For Design Review Board consideration on June 11, 2018)

Project Summary

Project Proponents & Property Owner. San Francisco Fire Department ("SFFD"), San Francisco Public Works ("SFPW"), and Port of San Francisco ("Port," Property Owner)

Project Representatives. Anthony Rivera (SFFD, Chief Deputy), Magdalena Ryor (SFPW, Project Manager), Jamie Hurley (Port, Project Development Manager), Dan Hodapp (Port, Senior Waterfront Planner), Ming Yeung (Port, Waterfront Planner), Bill Krill (Swinerton-Power Joint Venture, Swinerton Builders, Project Executive), William Knudson (Power Engineering Construction, Project Manager), Alan Kawasaki (Shah Kawasaki Architects, Project Architect), Erik Soderberg and Leah Olson (Liftech Consultants, Project Engineers), Ellen Johnck (Environmental Permitting Consultant)

Project Site. The project site is located on the City and County of San Francisco's waterfront at Piers 22.5 and 24, on The Embarcadero, northeast of Harrison Street. The site is bound by Rincon Park including the Waterbar and Epic Steak restaurants to the north, the Bay to the east, Pier 24 to the south, and Herb Caen Way and the Embarcadero to the west. The Ferry Building is located approximately 2,250 feet to the north. The project site is within the Northeast Waterfront planning area as defined by the Commission's San Francisco Waterfront Special Area Plan (SAP).

Existing Conditions. Pier 22.5 is a non-historic finger pier with a 2,200-square-foot shed, along which up to two fireboats are moored. The shed is used as a repair shop for the fireboats and living quarters for the fireboat pilots. A small parking lot is also located on the pier adjacent to Herb Caen Way. Directly south of Pier 22.5 is pile-supported marginal wharf structure, upon which SFFD Fire Station 35 is located. The two-story fire station was built in 1915, and is a designated San Francisco Landmark and a contributing resource to the Port of San Francisco's Embarcadero Historic District, listed in the National Register of Historic Places. The fire station includes a garage with capacity for one fire engine, lodging facilities serving a 21-person fire company, a kitchen, a

fitness area, and equipment storage (Exhibit 4). The historic firehouse provides character, but does not meet modern design standards for firehouse facilities. A small parking lot is located directly south of the fire station on the marginal wharf, within which an auxiliary water supply system manifold (to draw water from the Bay for use in an emergency) and backup generator are also located. Off the marginal wharf to the south is a dilapidated pile supported pier which is a remnant portion of the former Pier 24. This pier is not in use due to its deteriorated condition.

Herb Caen Way runs parallel to the project site, and is a required public access area under BCDC Permit No. 1990.008. Herb Caen Way, which ranges from 40- to 80-feet-wide in front of the project site, doubles as the Bay Trail at this location, and is within a dedicated view corridor under BCDC Permit No. 1990.008 that runs along the shoreline to the north and south of the project site. Harrison and Folsom Streets are also dedicated view corridors under BCDC Permit No. 1990.008 (Exhibit 2.)

Proposed Project. Since the project's first review by the DRB and Port of San Francisco's Waterfront Design Advisory Committee (WDAC) on February 26, 2018, the project proponents have worked to address the DRB and WDAC's comments in the project design.

The updated project would still demolish Pier 22.5 (including the shed), a portion of the marginal wharf (the south parking area), and the remaining section of Pier 24 (south finger pier) (Exhibit 5). A two-level, 14,487-square-foot (139.3-foot by 52-foot), two-story fireboat station would be constructed on a 16,435-square-foot (151-foot by 95-foot) steel float. The apron around the floating fire station (ranging from 10 feet to 33 feet in width) would provide mooring for at least three fireboats and one small rescue watercraft. A gangway and access ramp would connect the existing marginal wharf to the float and provide for pedestrian and vehicle access to the floating fireboat station. The floating fireboat station would be constructed off-site and transported to the project site by tug boat. The existing Fire Station 35 would remain in place and no renovation work is proposed for that structure nor the portion of the marginal wharf that would remain.

Within the Commission's Bay and 100-foot shoreline band jurisdictions, the proposed project includes the following:

1. **Steel Float (Exhibits 6-9, 11, 13, 16-21, 25, 30).** An approximately 16,435-square-foot (173-foot by 95-foot) steel float would be installed approximately 44 feet offshore of the marginal wharf and moored by up to six 48-inch vertical steel pipe guide piles. Lift cranes mounted on the float would be used to move equipment and small craft between the float and the water. This project component remains the same as that presented to the DRB and WDAC at their first review, with the exception of a change in the location of the two 48-inch guide piles on the inland side of the float to be located closer to the pedestrian gangway. (BCDC Senior Engineer will request a stability analysis for the change in location.) The placement of jet ski access to the water has also shifted. The length of the float is designed for fireboat mooring and was therefore considered independent of the change in size of the proposed fireboat station.
2. **Fireboat Station (Exhibits 6-21, 25, 27-30).** A two-story, 31.6-foot tall (at parapet) fireboat station would be built atop the steel float. In sections with the mechanical equipment and screen on the roof, the total height of the fireboat station would be 36 feet. The perceived height of the fireboat station from the shoreline would vary as the float rises and falls along with the tides. The height of the fireboat station has been reduced from 34 feet tall to 31.6 feet at parapet since the first DRB and WDAC project review, but remains the same

height in sections with mechanical equipment at 36 feet. The length of the fireboat station has been reduced from 151 feet to 139.3 feet, reducing the square footage by approximately 1,217 square feet or 8% (from 15,704 square feet in the original iteration to the 14,487 square feet currently proposed). This change is primarily due to the reduction of space related to and/or numbers of toilet fixtures, beds, desks, and shafts.

The first floor of the fireboat station would include the following facilities: a rescue boat bay, night watch room, electrical room, space for gear cleaning and decontamination after emergency responses, equipment lockers, fireboat maintenance and repair equipment, fuel storage, and turn-around area to allow ambulances access to the station. The south side of the first floor would have large doors to allow ambulances to use the large open space on the first floor as a loading and turn-around area. The first floor operations, including the ambulance turn-around, determined the footprint of the structure. A backup generator (replacing the generator located at the south parking lot) was proposed on the first floor at the first DRB/WDAC project review, but has since been proposed for placement on the roof.

The second floor would include a total of 35 beds (an open dormitory space with 23 beds and 4 private-bathroom officer dormitory rooms with 3 beds each), a laundry room, day room, dining area, kitchen with outdoor observation deck at the east end of the building, and lockers, showers and bathrooms. The number of beds has increased from 28 to 35 beds since the first DRB/WDAC review, with the addition of 7 beds in the dormitory space. The added beds are intended for a dedicated marine unit of firefighters to be stationed at the new building, and would not expand the building footprint. The roof would contain mechanical equipment. There would be two slide poles, two exit stairs, and one elevator that connects the first and second floor areas. A balcony would be located at the east end of the building facing out into the Bay, located off the common areas.

The exterior design of the fireboat station has been modified since the first DRB/WDAC project review. Silver ribbed metal panels are now proposed (formerly smooth white metal panels) and steel plate is also proposed (formerly board-formed concrete base), with the design intent of creating an industrial “pier shed” rather than a white terra cotta “bulkhead building.” The north façade has been redesigned to increase visibility inside and through the building, with 50% more glazing on the ground floor of the north façade allowing views of the Bosun’s room, water craft, and stairs.

3. **Vehicular and Pedestrian Access Ramp (Exhibits 6-7, 13, 21, 25-26, 30).** An approximately 80-foot-long, 18.5-foot-wide (1,482-square-foot) access ramp and associated corbel would provide vehicular and pedestrian access to the float, with a total footprint of approximately 1,800 square feet. The ramp would be striped for one lane of vehicular traffic and a pedestrian lane. A security gate would be installed at the landside end of the ramp. A triangular portion of the ramp is designed for hose laydown from the fireboats and floating firehouse to the AWSS manifold located on the marginal wharf. *This project component remains the same as that presented to the DRB/WDAC at the first review.*

4. **Pedestrian Gangway (Exhibits 6-7, 18-19, 25-26).** A 40-foot-long by 4-foot-wide aluminum gangway (160 square feet) would be installed to connect the marginal wharf and historic firehouse to the floating firehouse. *This project component remains the same as that presented to the DRB/WDAC at the first review.*

5. **Fencing (Exhibits 6-7, 21-22, 24-26).** The fence line on the marginal wharf north and south of the historic Fire Station 35 would be pulled back towards the water to create additional public access space. New gates would be installed, including three-foot-wide pedestrian access gates and a 16-foot wide vehicle gate north of the historic fire station, a 12-foot-wide pedestrian gate south of the historic fire station, and a 12-foot-wide vehicle gate leading to the vehicular and pedestrian access ramp. The gates and fencing would be 9 feet-9 inches tall, with 10-foot-high posts. The areas enclosed with fencing at the site have been reduced since the first DRB/WDAC review. The auxiliary water supply manifold (AWSS) will no longer be located behind fencing. An electrical service switchboard with public access information signage would be installed near the AWSS, also not behind fencing.

6. **Marginal Wharf Public Access (Exhibits 6-7, 21-22, 25-26).** If feasible, pending the findings of a structural integrity conditions study, a 1,030-square-foot portion of the marginal wharf south of the existing fire station would be retained and made accessible to the public during daylight hours. A 492-square-foot portion of the marginal wharf on the north side would be provided for public access through the removal of fencing and installation of a new gate pulled back to the façade of the historic firehouse. These areas would be available for public access only during daylight hours. These project components have been added since the first DRB/WDAC review.

7. **Public Observation Deck (Exhibits 6-7, 21, 23, 25-26).** A 1,920-square-foot pile-supported public observation deck would be constructed adjacent to and flush with Herb Caen Way, directly south of the vehicular and pedestrian access ramp (1,600 square feet over water and 320 square feet on land.) It would include artwork and interpretive panels related to the fireboats and historic and modern fire stations. The observation deck area has increased from the 951-square-foot deck presented to the DRB/WDAC at their first review.

8. **Bayside History Walk Components (Exhibits 6-7, 21-23, 25-26).** The interpretive panel display and artwork at the public observation deck are now proposed as components of the Bayside History Walk. The artwork concept has shifted in location and purpose since the first DRB/WDAC review, from a sea level rise exhibit marker in the Bay to a piece emphasizing the history and operations of Fire Station 35 and its fireboats, which may include reference to the fire boats' importance in the aftermath of the 1989 Loma Prieta Earthquake, located on the observation deck.

   In addition, the historic Fire Station 35 is open to the public during daylight hours, including the use of the bathroom facilities. The public may tour the building by knocking on the south-side door, pending staff availability.

9. **Modified Use of the Historic Fire Station 35 (Exhibits 4,6).** In the updated project design of the floating fire station, the Extractor Room has been moved to the historic Fire Station 35, where firefighters will wash and dry their turnouts after landside call for service. The on-land historic station will also support a fitness room (in the current dormitory), and storage areas for landside firefighting gear (in the current Officers', Engineers', and Boat Officers' rooms). The first-floor kitchen and communications rooms will remain as-is to preserve historic integrity, and the public will be able to access the first floor when staff is available. Current use of Fire Station 35 to house and deploy Fire Engine 35 will continue.

Project Approvals and Proposed Construction Timeline. The project has not yet received regulatory approvals. The San Francisco City Planning Department is the CEQA lead agency and is preparing an Initial Study and Preliminary Mitigated Negative Declaration, to be published as a draft for public comment in June 2018 with the final document anticipated in July 2018. The proposed construction timeline would be from approximately April 2019 through early 2021, pending regulatory approvals.

Operations & Maintenance. The construction of the new steel float and fireboat station is intended to improve the City of San Francisco's capacity for meeting current and future demands for water rescue and emergency response services, including the training of staff. The existing company of fire department personnel would be relocated from the historic firehouse to the floating fireboat station, to bring this station's company up to modern standards, in addition to consolidating SFFD's Marine Assets into a single location. A new, dedicated marine unit of firefighters will be housed at the proposed fireboat station, and during emergencies, the proposed facility will accommodate additional staff. The proposed fireboat station is considered an essential facility (necessary for emergency operations subsequent to a disaster) and is being designed to meet the Immediate Occupancy Performance Level in the event of a Design Earthquake, and the Life Safety Performance Level in the event of a Maximum Considered Earthquake, in addition to meeting Port Building Code requirements.

Resilience and Adaptation to Rising Sea Level. According to the Federal Emergency Management Agency ("FEMA"), current 100-year-base flood elevation (BFE) for the project site is +9.8' NAVD88[1]. As proposed, the steel float and new fireboat station are intended to accommodate projected sea level rise through the floating design with the piles extending to +25' NAVD88. The top of the float would rise and fall with tides on its proposed guide piles. The existing fixed pier and Herb Caen Way are situated at elevation +10.90' NAVD88. The proposed public access observation area would also be at +10.90' NAVD88. For planning purposes, the project proponents have estimated 2.8 feet (33.6 inches) of sea level rise by 2070 (BFE+2.8'SLR = +12.6' NAVD88) and 4.5 feet (54 inches) of sea level rise by 2100 (BFE+4.5'SLR = +14.3' NAVD88). The design total water level (TWL) in 2070 is +14.9' NAVD88, and in 2100 is +16.6' NAVD88.

The Ocean Protection Council (OPC) recently released an updated State of California Sea Level Rise Guidance document, which provides sea level rise projections and guidance for projects in different risk categories. The San Francisco projections for the medium-high risk category, under the high-emissions scenario, show 3.5 feet of sea level rise by 2070 (BFE+3.5'SLR = +13.3' NAVD88) and 6.9 feet of sea level rise by 2100 (BFE+6.9'SLR = +16.7'NAVD88). Using these projections, total water level would be approximately +15.6' NAVD88 in 2070 and +19' NAVD88 in 2100. Project Proponents are aware of this guidance and are providing updated information at the meeting.

The steel float and fireboat station have a design life of 50 years. The top of the steel float guide pile collars at the design high water will be approximately +18.2' NAVD88, and the guide piles have a top elevation of +25' NAVD88, which indicates that the steel float and fireboat station would not be inundated by sea level rise projections for 2070 or 2100, as they would rise with increased water levels. The access ramp and gangway connection would be inundated by 2070 at

[1] Elevation +9.8' NAVD88 represents the Still Water Level Base Flood Elevation. This area may have a higher Total Water Level Base Flood Elevation that would need to be considered for shoreline flooding.

their current land-based elevations; the design of these connections is intended to accommodate disconnection and reinstallation if the shoreline needs to be raised in the future due to sea level rise. The public access observation area and existing pier, including Fire Station 35 and Herb Caen Way, would not be inundated daily by 2070 with the project proponents' estimate of sea level rise, but will likely flood be beginning with the 2-year Still Water Flood Event (elevation +10.66' NAVD88) when wave action is taken into consideration. Herb Caen Way, the historic Fire Station, and the proposed public access will be inundated by the BFE in 2070. Using the OPC guidance, Herb Caen Way, the historic Fire Station, and the proposed public access would be overtopped by a combination of sea level rise and the BFE by 2040, and would be exceeded by MHHW by 2080. No adaptation plan has been proposed for the public access areas.

Prior DRB and WDAC Review. The project was reviewed at a joint meeting of the DRB and WDAC on February 26, 2018. The joint boards' comments included recommendations to (1) further explore the treatment of the facades and materials; (2) take the pressure off of the new fireboat station by using portions of the historic Fire Station 35; (3) use materiality that differentiates the new building from the historic building; (4) reevaluate types of materials, such as the use of metal panels, colors, and board-form concrete; (5) open the façade, particularly on the north side, to allow the public to see in and through the building; (6) provide additional information on what is happening inside the building; (7) address questions on the floating nature of the building, its technology, and services it is providing to tell its own story more dramatically; (8) make it educational inside the facility like the Exploratorium; (9) make the historic building more graciously treated and publicly visible and accessible, including moving the fences back as much as possible; (10) think about designing it to take on the idea of the lightness of the float, barely touching; (11) make the upper roof form softer, at least an oval expression, such as the Exploratorium roof; and (12) consider the need for individuals on the other side of the Embarcadero to look down on the new fireboat station. Project Proponents have provided responses to these comments in the accompanying exhibits.

Commission Findings, Policies & Guidelines

San Francisco Waterfront Special Area Plan (SAP). The Commission's SAP for the San Francisco waterfront includes general and geographic-specific policies related to public access, waterfront design, and views at and near the project site.

The SAP policies on **Public Access** state, in part, that public access should "provide direct connections to the Bay, both physical and visual," should "focus on proximity to the Bay and on the views and unique experiences that nearness to the Bay affords," and handrails should "maximize visual access to the Bay, particularly for children and persons in wheelchairs." Further, public access improvements should be low-maintenance, have longevity "commensurate with the longevity of the development improvements for which they are required," and should "generally be accessible at any time" but may have reasonable restrictions. The SAP policies note that when "maritime use projects create public safety concerns, public access may be restricted or not required. When ship loading and service areas temporarily preclude complete perimeter access for the period of time of the use, due to legitimate safety concerns, such areas should be reopened to public access when the conflict is not present." Public access should address

microclimates and should provide interpretive and directional signage. Additionally, “[p]ublic overlooks and viewing areas with convenient pedestrian access should be provided on piers…” and a "continuous public access system called the PortWalk between Pier 35 and China Basin which includes Herb Caen Way" should be created. A Bayside History Walk should also be created, which should, in part, “[p]rovide interpretive amenities…including historic photographs, explanatory text and maritime artifacts so that the History Walk functions as a self-guided tour of the waterfront. Portions of the Bayside History Walk may be covered by structures.” The public access policies also state that "[v]ehicle circulation in public access areas should be limited to service and maintenance vehicles necessary to serve the facility and should be concentrated during late night and early morning hours."

Further, the SAP states that “[o]n-pier public access areas should be located to take advantage of the Open Water Basins, views of the Bay and its shoreline, views back to the City, wind protection and solar access. They should incorporate unique and special amenities that draw the public to them, including cultural expression (e.g. public art, event programming or unique views).” Additionally, “[h]istoric structures should be showcased as an important amenity in the design of public access areas.”

The SAP policies on Public Access Siting and Design also state that “[a]bove-grade utility boxes within public access areas should be discouraged and only permitted if they can be integrated into a public serving feature, such as a kiosk, or appropriately screened against a pier shed wall.”

The SAP policies on **Waterfront Design** state, in part, that “[d]evelopment should take advantage of its location on the Bay and reflect and recognize the unique identity of the waterfront districts…” The finger pier configuration of the waterfront should be maintained “to the maximum practicable extent.” Further, “[b]uilding height and bulk should generally be low scale in order to preserve views to the Bay, minimize shading of on-pier public access areas and reflect the historic character of the waterfront.” Waterfront design should “[t]ake advantage of the Bay as a design asset by encouraging transparent buildings and other design treatments…” Additionally, waterfront design should avoid the use of reflective glass as well as the placement of “mechanical equipment, pipes, or ducts on roof surfaces.”

The SAP policies on **Bay Views** state, in part, that “[d]iverse views of the Bay, the City and waterfront and maritime activities along the water’s edge should be provided at frequent intervals along The Embarcadero and Herb Caen Way…and from public plazas and public access on piers…” Additionally, “[s]treet rights-of-way that connect with the waterfront should be preserved and improved as view corridors to the Bay, maritime activites, or waterfront structures. …” The SAP states that Bay views from Folsom Street and Bay Bridge views from Harrison Street should be preserved or improved as part of new development on piers. Minor encroachments that would modify these views may be permitted, in part, “[w]here essential maritime facilities cannot reasonably be located and designed to avoid view blockage.” The SAP policies further state that “[v]iews of the water should be maximized by designing handrails, fences, marina gates, canopies and other shoreline accessory structures with maximum practicable transparency.

The proposed project would develop a public observation deck adjacent to Herb Caen Way and would increase the area of the marginal wharf available to the public, with views of the Bay and Bay Bridge as well as the fireboat station. Interpretive signage and handrails are also proposed.

San Francisco Bay Plan Policies. The Bay Plan **Public Access** policies state, in part, that "…maximum feasible access to and along the waterfront and on any permitted fills should be provided in and through every new development in the Bay or on the shoreline…" and that "[a]ccess to and along the waterfront should be provided by walkways, trails, or other appropriate means and connect to the nearest public thoroughfare where convenient parking or public transportation may be available." Further, these policies state, in part: that "… improvements should be designed and built to encourage diverse Bay-related activities and movement to and along the shoreline, should permit barrier free access for persons with disabilities to the maximum feasible extent, should include an ongoing maintenance program, and should be identified with appropriate signs," and that access should be designed consistent with the physical and natural environment.

The proposed public observation area would extend over the Bay from Herb Caen Way, and fencing would be pulled back to increase public access on the marginal wharf. The public observation area would be constructed flush with the pedestrian promenade and would be universally accessible.

Bay Plan Public Access policies, as they relate to sea level rise, state that "[p]ublic access should be sited, designed, managed, and maintained to avoid significant adverse impacts from sea level rise and shoreline flooding," and that "[a]ny public access provided as a condition of development should either be required to remain viable in the event of future sea level rise or flooding, or equivalent access consistent with the project should be provided nearby."

The steel float and fireboat station would float with the tides. The pile supports would function until such time as sea level rise exceeds the height of the guide pile collars. The marginal wharf, the gangway landing connecting to the float, and the public access area would be inundated by the 100 year base flood elevation at 2070, and may be inundated by the BFE by 2040 using the OPC guidance for medium-high risk aversion projects.

The Bay Plan **Appearance, Design, and Scenic Views** policies state, in part, that "all bayfront development should be designed to enhance the pleasure of the user or viewer of the Bay" and that "[m]aximum efforts should be made to provide, enhance, or preserve views of the Bay and shoreline, especially from public areas..." Furthermore, "[s]tructures and facilities that do not take advantage or complement the Bay should be located and designed so as not to impact visually on the Bay and shoreline. …"

The public observation deck and public access areas on the marginal wharf would provide views of the Bay and Bay Bridge, as well as views of the maritime activities at the floating fireboat station. The proposed fireboat station, float, piles, and access ramp can be seen from along the shoreline at Herb Caen Way and The Embarcadero, as well as from Harrison Street (Exhibits 8-9, 21, 27-29).

Public Access Design Guidelines. The Commission's Public Access Design Guidelines state that public access should be designed "so that the user is not intimidated nor is the user's appreciation diminished by large nearby building masses…." Furthermore, "public access improvements should be designed for a wide range of users," should provide "interpretation of historical, cultural or natural attributes of the site," and should "[orient] the development to Bay views and provid[e] physical connections at every opportunity." The guidelines also state that viewing the Bay is the "most widely enjoyed 'use' and projects should be designed to "enhance and dramatize views of the Bay."

Board Questions

The Board's advice and recommendations are sought on the following issues regarding the project's design:

Visual Impacts:

1. Has the revised fireboat structure been sited and designed to avoid and minimize potential view impacts from the shoreline with respect to its orientation to the shoreline, building massing, proposed building materials, guide piles, and other design considerations? Conversely, does the revised design preserve and enhance the view corridors to the Bay along the pedestrian promenade and Harrison Street, and otherwise maximize views to the Bay?
2. Are there alternatives designs that should be explored to balance the operational and functional needs of the project with the Commission's mandate to protect and enhance the visual resources provided by the Bay? Does the revised proposal for use of the historic Fire Station 35 complement the proposed uses for the new fireboat station?
3. Are the revised improvements, including the float and new fireboat station, sufficiently transparent and appropriate in terms of height, bulk, and location to minimize potential adverse impacts to Bay views, given the operational needs?

Physical Public Access:

4. Does the revised public access proposal (including the pier-supported public observation area, marginal wharf public access, and Bayside History Walk components) provide the best opportunities to enhance shoreline public access and enhance Bay views in the vicinity of the project site, or are there additions and/or alternative improvements and locations that should be considered?
    a. Would the public benefit from additional perimeter access on the north side of the marginal wharf next to the historic fire station, when use conflicts are not present? (The extra rig is parked on the wharf when the station's rig goes in for service. The rig is parked outside because it is a larger vehicle that does not fit in the firehouse.
5. Does the revised public access take advantage of views to the Rincon Point Open Water Basin to the north of the site?
6. Does the proposed public access (including the public observation area, marginal wharf public access, and Bayside History Walk components) incorporate unique and special amenities that will draw the public to the site? Are there additional opportunities to increase historical, cultural, and natural resource interpretation on site?
7. Does the revised location and design of the fences around the historic firehouse minimize potential adverse impacts to Bay views, and create a sense of public connection at the proposed public access space, while maintaining public safety?

Sea Level Rise:

8. How could the revised public access for this project be appropriately designed to be resilient and adaptive to sea level rise?